

December 27, 2018

**VIA ECF**

The Honorable Pamela K. Chen  
United States District Judge  
for the Eastern District of New York  
Courtroom: 4F  
Chambers: N 631  
225 Cadman Plaza East  
Brooklyn New York 11201

Re: ***Roque Lopez et al. v. Pronto Pizza 02 LLC, et al.,***  
**Case No. 1:18-cv-5639 (PKC) (VMS)**

Dear Judge Chen:

We are counsel to the Defendants in the above-referenced matter. We submit this letter pursuant to paragraph 1(F) of Your Honor's Individual Rules of Practice in Civil Cases, to respectfully request a 30-day extension of the deadline by which Defendants may answer, move or otherwise respond to the Complaint in this matter.

This is Defendants' second request of this nature and is occasioned by previously-unanticipated holiday-season conflicts, as well as the parties' desire to explore an amicable resolution of this matter. Defendants' previous response deadlines were November 7, 2018 for Pronto Pizza 02 LLC and Pronto Pizza 03 LLC, and December 28, 2018 for all Defendants. Plaintiff's counsel has consented to this request, which would require an adjournment of the presently-scheduled January 3, 2019 date by which to file a joint proposed scheduling order and the January 8, 2019 Initial Conference in this matter. The parties respectfully request an adjournment of those dates to February 1, 2019 and February 7, 2019, respectively. As noted above, Defendants anticipate that the additional time contemplated by this request will, in part, be used by the parties to pursue a resolution of the instant matter.

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We thank the Court for its time and attention to this matter.

Respectfully Submitted,

MANATT, PHELPS & PHILLIPS, LLP

/s/ *Brian J. Turoff*

Brian J. Turoff

BJT:dcn

cc: All Counsel of Record via ECF